

1 Daniel N. Raytis, California SBN 218374  
2 [dan@bbr.law](mailto:dan@bbr.law)

3 BELDEN BLAINE RAYTIS, LLP  
4 5016 California Avenue, Suite 3  
5 Bakersfield, California 93309  
6 Telephone: (661) 864-7827  
7 Facsimile: (661) 878-9797

8 Attorneys for Defendant  
9 Quail Valley Water District

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 HILLCREST INVESTMENTS, LTD., a  
13 foreign corporation; HILLCREST  
14 PROJECTS, LLC., a foreign limited liability  
15 company;

16 Plaintiffs,

17 v.

18 CHICAGO TITLE INSURANCE  
19 COMPANY, a foreign entity; QUAIL  
20 VALLEY WATER DISTRICT, a foreign  
21 entity; 11239, LLC, a foreign entity;  
22 R.A.M.M. CORP., a Nevada Corporation;

23 Defendants.

Case No. 2:22-cv-00406-RFB-VCF

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT TO RESPOND TO  
COMPLAINT  
(First Request)**

24 Defendant, Quail Valley Water District, (“Defendant”) by and through its counsel of record,  
25 Daniel N. Raytis, Esq., of Belden Blaine Raytis, LLP (admitted *pro hac vice*) and Plaintiffs, Hillcrest  
26 Investments, Ltd. and Hillcrest Projects, LLC (“Plaintiffs”), by and through their counsel of record,  
27 Mitchell S. Bisson, Esq., hereby jointly submit this stipulation and order to extend Defendant’s  
28 deadline to file its response to the Complaint (ECF No. 1, served on April 20, 2022), to thirty (30)  
days after entry of this Order.

This is the parties’ first request for an extension of this deadline and is not intended to cause  
any delay or prejudice to any party.

///

1 Defendant is an out-of-state entity. Defendant's counsel was permitted to appear *pro hac*  
2 *vice* in this matter by an Order of the Court on June 15, 2022. The parties request this extension in  
3 order to provide Defendant with sufficient time to obtain documents, materials and information  
4 relevant to Plaintiff's claims alleged against Defendant in order to respond to the Complaint and/or  
5 discuss settlement of the same.

6  
7 Dated: June 16, 2022

BELDEN BLAINE RAYTIS, LLP

8  
9 By: /s/ Daniel N. Raytis

10 DANIEL N. RAYTIS  
11 Attorneys for Defendant Quail Valley  
Water District

12  
13 Dated: June 16, 2022

THE LAW OFFICES OF MITCHELL  
S. BISSON

14  
15 By: /s/ Mitchell S. Bisson

16 MITCHELL S. BISSON, ESQ.  
17 Attorney for Plaintiffs

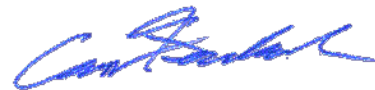
18 **ORDER**

19 Based upon the stipulation of the parties, and good cause appearing,

20 **IT IS SO ORDERED.**

21 Dated this 17th day of June, 2022.

22 IT IS HEREBY ORDERED that the  
23 response to the complaint must be  
filed on or before July 18, 2022.



24 **UNITED STATES MAGISTRATE JUDGE**  
25 **Case No. 2:22-cv-00406-RFB-VCF**  
26  
27  
28